REMARKS

Claims 1 – 13, 17 – 25, and 27 - 30 are pending. Claims 14 – 16 and 26 have been cancelled. Claim 1 – 13, 17 – 25, and 27 – 30 have been amended. No new matter has been introduced. Reexamination and reconsideration of the application are respectfully requested.

In the December 15, 2005 Office Action, the Examiner objected to claims 4 – 6, 16, and 22 – 23 due to informalities. The applicant has addressed the Examiner's objections by amending claims 4 – 6 and 22 – 23. The applicant has cancelled claim 16. The applicant respectfully requests that the objections to claims 4 – 6, 16, and 22 – 23 be withdrawn.

In the December 15, 2005 Office Action, the Examiner rejected claims 1 – 3, 7, 10 – 18, 20, 22 – 27, and 29 – 30 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent Application Publication No. 2002/0161867 to Cochran et al. ("the Cochran reference"). The Examiner rejected claim 21 under 35 U.S.C. § 103(a) as beng unpatentable over the Cochran reference. The Examiner rejected claims 4 – 6, 8 – 9, 19 and 28 under 35 U.S.C. § 103(a) as being unpatenable over the Cochran reference and further in view of U.S. Patent No. 6,691,170 to Gitlin et al. ("the Gitlin reference") These rejections are respectfully traversed, as they are applicable to the presently pending claims.

Independent claim 1, as amended, distinguishes over the cited references. Independent claim 1, as amended, recites:

> A method for configuring a headless device, comprising:
> **sending, by a self-initiated configuration mechanism in the**
> **headless device, a configure service request to a configuration**

**service mechanism across a network, the service request asking for
a configuration specification corresponding to the headless device;**
    receiving, by the configuration service mechanism, the
configuration specification to the self-initiated configuration mechanism;
and
    configure, by the self-initiated configuration mechanism, the
headless device according to the configuration specification received from
the configuration service mechanism.

The Cochran reference does not disclose the method of claim 1, as amended.

The Examiner states that paragraphs [0037 – 40] discloses sending, by a self-initiated

configuration mechanism in a headless device, a configure service request to a

configuration service mechanism across a network. *(Office Action, page 3)*. The

applicants respectfully disagree with the Examiner. There is no disclosure that a

headless device (including a self-initiated configuration mechanism) sends a configure

service request to a configuration service mechanism across the network, as is recited

in claim 1, as amended. The Cochran reference discloses that a device configuration

assembly initiates an interactive device configuration process between the remote

device configuration assemblies and the desired computing device. The remote device

configuration assemblies may include databases, software applications, network

parameters, etc. for the computing devices. The remote device configuration

assemblies may transmit web pages to the computing devices, including headless

computing devices. *(Cochran, paragraphs [0039 - 0040])*. The Cochran reference also

discloses that the device configuration assembly may be utilized to obtain network

addresses for the headless devices. *(Cochran, paragraph [0037])*.

This is not the same as a method for configuring a headless device including

sending, by a self-initiated configuration mechanism in the headless device, a

configure service request to a configuration service mechanism across a network, the service request asking for a configuration specification corresponding to the headless device. It is not the same because the Cochran reference headless devices, i.e., computing devices 48 – 64 and 66 – 82, do not **send a configure service request,** as recited in claim 1, as amended. In contrast, the Cochran reference discloses that a device configuration assembly initiates communication between a remote device configuration assembly and the computing devices (headless devices). The headless devices in the Cochran reference do not initiate the configuration request. Accordingly, applicants respectfully submit that claim 1, as amended, distinguishes over the Cochran reference.

The Gitlin reference does not make up for the deficiencies of the Cochran reference. The Examiner states that the Gitlin reference teaches the use of an alternative routable address. *(Office Action, page 11).* The applicants respectfully disagree with the Examiner's statement and also note that the Gitlin reference does not disclose a method for configuring a headless device including **sending, by a self-initiated configuration mechanism in the headless device, a configure service request to a configuration service mechanism across a network, the service request asking for a configuration specification corresponding to the headless device.** Accordingly, claim 1, as amended, distinguishes over the Gitlin / Cochran reference combination.

Independent claims 7, 17, 24, and 27 recite limitations similar to claim 1, as amended. Accordingly, applicant respectfully submits that independent claims 7, 17, 24, and 27, all as amended, distinguish over the Cochran / Gitlin reference combination for

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reasons similar to those discussed above in regard to independent claim 1, as amended.

Claims 2 – 6, 8 – 9, 18 – 21, 25, and 28 depend, indirectly or directly, on independent claims 1, 7, 17, 24, and 27, respectively. Accordingly, applicant respectfully submits that claims 2 – 6, 8 – 9, 18 – 21, 25, and 28 distinguish over the Cochran / Gitlin reference combination for the same reasons as those discussed above in regard to claim 1.

Dependent claim 4 further distinguishes over the cited references. Dependent claim 4, as amended, recites:

> The method according to claim 3, wherein the sending includes:
> requesting a routable address from a DHCP server;
> **selecting, if the routable address cannot be retrieved from the DHCP server, an alternative routable address from at least one alternative routable address stored in an alternative routable address storage in the headless device;** and
> requesting the configuration from the configuration service mechanism using the device identification, that is to be used to identify the configuration specification, and the routable address or the alternative routable address, to where the configuration specification of the headless device is to be returned.

The Examiner states that the Cochran reference does not disclose the limitation of selecting, if the address for the server cannot be retrieved from the self-initiated configuration mechanism, a routable address from at least one alternative routable address stored in the self-initiated configuration mechanism. *(Office Action, page 11).* The applicant agrees with the Examiner and respectfully submits that claim 4 further distinguishes over the Cochran reference.

The Gitlin reference does not make up for the deficiencies of the Cochran reference. The Examiner states that the Gitlin reference teaches the use of an

alternative routable address at column 3, lines 11 – 25 of the Gitlin reference. *(Office Action, page 11)*. The applicants respectfully disagree with the Examiner. The Gitlin reference specifically discloses that a DHCP server manages the IP addresses of PC clients on the network and makes sure that no two identical IP addresses are on the network. Also, if the PCs power down, the DHCP server negotiates new IP addresses for the device and the PC/clients connecting onto the network. *(Gitlin, col. 3, lines 11-25)*.

This is not the same as a method for configuring a headless device, wherein **selecting, if the address cannot be retrieved from the DHCP server , an alternative routable address from at least one alternative routable address stored in a alternative routable address storage in the headless device.** It is not the same because the Gitlin reference discloses only that <u>a DHCP server is allocating or assigning devices to PC clients connected to the network</u> and the Gitlin reference never discloses **selecting a routable address from an alternative routable address storage**, as recited in claim 4, as amended. Accordingly, applicant respectfully submits that claim 4, as amended, distinguishes over the Gitlin / Cochran reference combination.

Claim 8, 19, and 28 recited limitations similar to claim 4, as amended. Accordingly, applicants respectfully submit that claims 8, 19, and 28 distinguish over the Gitlin / Cochran reference combination.

Claim 10 distinguishes over the cited prior art. Claim 10, as amended, recites:

A method for a configuration service, comprising:
receiving a configure service request from a headless device with a device identification associated with the headless device;
initializing a configuration specification of the headless device, if the request

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requests to set up an initial configuration specification of the headless device with the configuration service;

updating the configuration specification of the headless device, if the request requests to update the current configuration specification of the headless device; and

forwarding the configuration specification of the headless device to a routable address received with the request, if the request requests a configuration service.

The Cochran reference does not disclose, teach, or suggest the method for a configuration service of claim 10. The Examiner does not state whether the device configuration assembly or the remote device configuration assemblies are being referred to in the office action. Nonetheless, neither of the device configuration assembly or the remote device configuration assembly disclose **receiving from a headless device a configure service request**, as recited in claim 10, as amended. In contrast, the Cochran reference discloses that the device configuration assembly initiates an interactive configuration process between the remote device configuration assemblies and the desired computing device. *(Cochran, paragraph [0040])*. After the initiation, the remote device configuration assembly can, transmit web pages to the computing device. *(Cochran, paragraph [0040])*. In other words, the headless device of the Cochran reference does not initiate the configure service request. Accordingly, applicants respectfully submit that claim 10, as amended, distinguishes over the Cochran reference.

Independent claims 22 and 29, both as amended, recite limitations similar to claim 10, as amended. Accordingly, applicant respectfully submits that claims 22 and 29 distinguish over the Cochran reference for reasons similar to those discussed above in regard to claim 10, as amended.

Claims 11 – 13, 23 – 25, and 30 depend, indirectly or directly, on claims 10, 22,
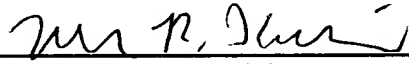
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and 29, respectively. Accordingly, applicant respectfully submits that claims 11 – 13, 23 – 25, and 30 distinguish over the Cochran reference for the reasons discussed above in regard to claim 10, as amended.

Applicant believes that the claims are in condition for allowance, and a favorable action is respectfully requested. If for any reason the Examiner finds the application other than in condition for allowance, the Examiner is requested to call the undersigned attorney at the Los Angeles telephone number (213) 488-7100 to discuss the steps necessary for placing the application in condition for allowance should the Examiner believe that such a telephone conference would advance prosecution of the application.

Respectfully submitted,

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